

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

MEDIA CONTENT PROTECTION LLC,

Plaintiff,

v.

MEDIATEK INC. and
 MEDIATEK USA INC.,

Defendants.

C.A. No.: 20-cv-1246-CFC

JURY TRIAL DEMANDED

**STIPULATION AND [PROPOSED] ORDER REGARDING THE COURT'S
RULING ON A MOTION FOR JUDGMENT ON THE PLEADINGS OF PATENT
INELIGIBILITY IN A RELATED CASE**

WHEREAS, on July 28, 2025, the Court entered an Order granting Defendant Realtek Semiconductor Corp.'s Motion for Judgment on the Pleadings Pursuant to Fed. R. Civ. P. 12(c) ("Realtek's Motion") on the grounds that the asserted claims of U.S. Patent No. 10,298,564 are ineligible under 35 U.S.C. § 101 in Case No. 20-cv-01247-CFC (D.I. 212);

WHEREAS, pursuant to the parties' Stipulation and Order entered by the Court in this case on July 10, 2025 (D.I. 196), this action was stayed and the Court's Order on Realtek's Motion applies equally to this Case as if entered directly herein;

NOW, THEREFORE, IT IS HEREBY STIPULATED by Plaintiff Media Content Protection, LLC ("MCP") and Defendants, MediaTek Inc. and

MediaTek USA Inc. (collectively, “MediaTek”) that, subject to the approval of the Court:

- 1) the stay of this action is lifted; and
- 2) an Order granting Judgment on the Pleadings pursuant to Rule 12(c) in favor of MediaTek Inc., in the form attached hereto as Exhibit A, will be entered by the Court.

By entering into this Stipulation, MCP and MediaTek do not waive any rights with respect to the Court’s order on Realtek’s Motion, including, to the extent applicable, any rights to seek reconsideration of and/or appeal from the Court’s order on Realtek’s Motion.

Dated: August 1, 2025

FARNAN LLP

/s/ Brian E. Farnan

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Respectfully submitted,

FISH & RICHARDSON, P.C.

/s/ Warren K. Mabey, Jr.

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Counsel for Defendants
MediaTek Inc., and
MediaTek USA Inc.

SO ORDERED this _____ day of _____, 2025.

THE HONORABLE COLM F. CONNOLLY
CHIEF JUDGE, UNITED STATES DISTRICT
COURT